

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

FILED

JUL 09 2014

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
OLIVER M. DOTTS,)
)
Defendant.)

CRIMINAL NO. 3:14-mj-3074-DGW

CRIMINAL COMPLAINT

I, Department of Homeland Security Special Agent Anthony Pavelcik, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

CONVEYING A FALSE THREAT

On or about July 8, 2014, in St. Clair County, within the Southern District of Illinois,

OLIVER M DOTTS,

defendant herein, did intentionally convey false and misleading information, under circumstances where such information may reasonably have been believed, that indicated that an activity would take place that would be a violation of Title 18, United States Code, Chapter 113B, the delivery, placement, discharge or detonation of an explosive in a place of public use or a government facility, with the intent to cause extensive destruction of such a place or facility where such destruction results in or is likely to result in major economic loss, in violation of Title 18, United States Code, Section 2332f(a)(1)(B). Specifically, DOTTS stated to Department of Homeland Security Special Agent Anthony Pavelcik at the Melvin Price Federal Building and Courthouse in

St. Clair County, Illinois, that whenever he [DOTTS] left the Courthouse, he was going to buy gasoline, pour it on vehicles parked in the Federal Courthouse parking lot and light them on fire. DOTTS said he would then go to a Post Office, pour gasoline on it, and set it on fire. DOTTS previously made the same false threat to members of the United States Marshals Service; all in violation of Title 18, United States Code, Section 1038(a)(1).

I further state that I am a Special Agent (SA) with the Department of Homeland Security (DHS) - Federal Protective Service (FPS) and that this Criminal Complaint is based on the following facts.

AFFIDAVIT

I, Anthony Pavelcik, am a Special Agent with DHS - FPS and have been so employed since September 2008 and have been conducting criminal investigations since 1997. I am vested with the authority to investigate violations of State and Federal law to include conducting criminal investigations pertaining to protecting federal facilities and their occupants in accordance with Title 40, United States Code, Section 1315(b)(2). The statements contained in this affidavit are based on my investigation, information received from a Deputy United States Marshal, and information derived from my personal conversations with DOTTS.

1. On July 8, 2014 at approximately 2:00pm, I was contacted by Deputy United States Marshal (DUSM) Chad Uhl who stated that OLIVER DOTTS came to the Melvin Price Federal Building and Courthouse (hereinafter "Courthouse"), 750 Missouri Avenue, East St. Louis, Illinois, 62201, in St. Clair County, Illinois, within the Southern District of Illinois, and told DUSM Uhl that he wanted to pour gas on any vehicles parked in the federal parking lot next to the building, light them on fire and then pour gas on the Post Office, a government facility, and light that building on fire. DUSM Uhl stated that, when he asked DOTTS why he

wanted to burn the Post Office, DOTTS replied, "I just don't like those people." DUSM Uhl stated he spoke with DOTTS for approximately ten minutes and towards the end of the interview, DUSM Uhl asked DOTTS what he was going to do when he left the Courthouse, to which DOTTS replied, "Go buy some gasoline and burn the cars and the Post Office." DUSM Uhl stated to me he was concerned enough by DOTTS' demeanor and his prior criminal history, which includes several violent offenses, that he took DOTTS' statement seriously, and therefore contacted the Department of Homeland Security - Federal Protective Service.

2. At approximately 3:15 p.m., I arrived at the Courthouse to interview DOTTS. When I asked DOTTS how he was feeling, DOTTS replied that he was a very angry young man who had suffered a lot of injustices in his lifetime and committed a lot of crimes. DOTTS stated that he does not have a second chance at life, he has drug and alcohol issues, he has no job and is homeless. DOTTS also stated that he is usually on psychotropic drugs due to mental health issues but has not been on his medications for a while.

3. I asked DOTTS to repeat what he told DUSM Uhl earlier that day. DOTTS said that he told DUSM Uhl that he wanted to damage some of the cars on the parking lot of the Courthouse and set them on fire. DOTTS said that he also told DUSM Uhl that DOTTS wanted to cause property damage to the Post Office by setting it on fire. DOTTS repeated to me his desire to set the Post Office, a government facility, on fire if he were released that night. DOTTS said that he wanted to burn the cars in the federal parking lot and burn the Post Office because he wanted to draw media attention to his acts so he could get help by being "put in therapy or a program" so that he could "get his medication."

4. Based on my experience as a Senior Special Agent in conducting threat investigations, during interview such as these, the high majority of subjects either rescind

their threatening statement(s) or apologize for making them. Due to DOTTS' calm and emphatic explanation that he would still carry out his threat to me and to Deputy Uhl earlier in the afternoon, I believed DOTTS would carry out his threat and had the ability and motivation to do so if he were allowed to leave the Courthouse.

5. DOTTS was convicted of Assaulting a Federal Officer in this district in 2005. DOTTS has a long, violent criminal history which began at the age of 16. DOTTS' past criminal history includes two (2) convictions for aggravated criminal sexual abuse, one involving a 16 year old girl when DOTTS was 28; three (3) battery convictions, and one (1) conviction for domestic battery. Especially relevant to this case are DOTTS' three (3) prior convictions for criminal damage to property.

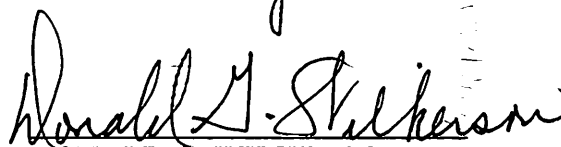
6. After speaking with DOTTS, I contacted Assistant United States Attorney (AUSA) Angi Scott and advised her of DOTTS' statements. AUSA Scott advised me that I had probable cause to arrest DOTTS for a violation of Title 18, United States Code, Section 1038(a)(1), based on his statements. AUSA Scott also advised me that we would apply for a Criminal Complaint on Wednesday, July 09, 2014.

7. After speaking with DUSM Uhl about where DOTTS could be held overnight, at approximately 4:20pm, DOTTS was placed into custody by the USMS and transported to the East St. Louis Jail to be held pending formal charges.


ANTHONY RAVELCIK
Special Agent
Federal Protective Service

State of Illinois)
) ss
County of St. Clair)

Sworn to before me and subscribed in my presence on July 9, 2014,
in East St. Louis, Illinois.


DONALD G. WILKERSON
United States Magistrate Judge

STEPHEN R. WIGGINTON
United States Attorney

Angela Scott
ANGELA SCOTT
Assistant United States Attorney